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Counsel Designated for Service of
Papers Per LR 10-1(b)

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Las Vegas Nevada 89102

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

NORTHERN DIVISION

In Re:)	CASE NO. 3:11-bk-53706-btb
)	Chapter 11
)	
DHILLON GROUP, LLC)	
dba Holiday Inn Express)	OBJECTIONS TO OMNIBUS
2902 Michelle Dr.)	DECLARATION OF JAGMOHAN
Sherman, TX 75092)	DHILLON IN SUPPORT OF DEBTOR'S
)	FIRST DAY MOTIONS [Doc 24]
Debtor)	
_____)	Date: January 3, 2012
		Time: 2:00 p.m.

United Central Bank objects to the Omnibus Declaration of Jagmohan Dhillon in Support of Debtor's First Day Motion (Doc 24) as follows:

Paragraph 10: Best Evidence - there is no cost of repairs prepared by the debtor.

Lack of Foundation: There is no evidentiary foundation for the proposed budget.

Paragraph 11: Lack of Foundation; Improper opinion testimony. The declaration assumes facts that are not established by evidence, to wit, that there is cash collateral.

Paragraph 12: Lack of Foundation; Improper opinion testimony. The declaration assumes

1 facts that are not established by evidence, to wit, that there is cash collateral.

2 Paragraph 14: Lack of Foundation; Improper opinion testimony. Involves speculation. The

3 declaration assumes facts that are not established by evidence, to wit, that

4 there is cash collateral. In addition, improperly assumes that the hotel is a

5 going concern.

6 Paragraph 15: Lack of Foundation; Improper opinion testimony. The declaration assumes

7 facts that are not established by evidence, to wit, that there is cash collateral.

8 Paragraph 16: Lack of Foundation; Improper opinion testimony. The declaration assumes

9 facts that are not established by evidence, to wit, that there is cash collateral.

10 Paragraph 17: Lack of Foundation; Improper opinion testimony. The declaration assumes

11 facts that are not established by evidence, to wit, that there is cash collateral

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13 DATED: December 26, 2011

/s/ George C. Lazar
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CERTIFICATE OF SERVICE

On December 26, 2011, a true and correct copy of the attached document was served as follows:

By the Court's ECF System (Local Rule 5005(c)):

A.J. KUNG on behalf of Debtor DHILLON GROUP, LLC
ajkung@ajkunglaw.com, bbrown@ajkunglaw.com; paralegal7@ajkunglaw.com;
paralegal4@ajkunglaw.com; paralegal5@ajkunglaw.com; paralegal3@ajkunglaw.com;
fileclerk@ajkunglaw.com; paralegal1@ajkunglaw.com

U.S. TRUSTEE - RN - 11 USTPRegion17.RE.ECF@usdoj.gov
(A courtesy copy was directly email to Bill Cossit at: Bill.Cossitt@usdoj.gov

By U.S. Mail:

A copy of the attached document was placed in addressed envelope(s) and the envelope(s) containing the document were placed into the U.S. Postal Service mail on December 26, 2011 at San Diego, California; copies were mailed to:

None

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: December 26, 2011

/s/ George C. Lazar

George C. Lazar